

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
NORTHERN DIVISION

UNITED STATES OF AMERICA,

CR 21-10004

Plaintiff,

REDACTED INDICTMENT

v.

Production of Child Pornography;
Transportation of Child
Pornography

ADAM ROBERT LANE,

Defendant.

18 U.S.C. §§ 2251(a) and 2251(e),
2252A(a)(1) and 2252A(b)(1)

The Grand Jury charges:

COUNT 1

On or about between July 18, 2020, and October 23, 2020, in the District of South Dakota, the Defendant, Adam Robert Lane, did knowingly employ, use, persuade, induce, entice, and coerce a minor, under the age of 18, to wit: "minor female A," whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported in interstate or foreign commerce or mailed, and such visual depiction would be produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, including by computer, and attempted to do so, all in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT 2

On or about between July 21, 2018, and September 27, 2020, in the District of South Dakota, and elsewhere, the Defendant, Adam Robert Lane, did knowingly transport child pornography using a means and facility of interstate and foreign commerce, in and affecting such commerce by any means, including by computer, in that, by use of the Internet, Adam Robert Lane uploaded graphic image and video files depicting one or more minors engaged in sexually explicit conduct into a Google account associated with the email addresses adammm3913@gmail.com and gabby3913@gmail.com, all in violation of 18 U.S.C. §§ 2252A(a)(1) and 2252A(b)(1).

FORFEITURE ALLEGATION

1. The allegations contained in this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 2253.

2. If convicted of an offense set forth above, Adam Robert Lane, the Defendant herein, shall forfeit to the United States any and all materials or property used or intended to be used in the possession, receipt, distribution and production of child pornography. Such property includes, but is not limited to:

1. Apple iPhone 8 with serial number F4GW974PJC6C, IMEI: 353002094768487;
2. Toshiba External Hard Drive (1TB) Model: E329786, SN: 54C1T2JZT3FB;
3. Samsung Cell Phone, Model: SM-S320VL(GP), IMEI: 359258074787723;

4. Dell Laptop, Model: Inspiron 1525 (PP29L), SN: 4NFWZG1;
and
5. Gateway Laptop, Model: Q5WTC, SN:
NXY1UAA030342113F63400.

A TRUE BILL:

NAME REDACTED

Foreperson

RONALD A. PARSONS, JR.
United States Attorney

By

